

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

Damien Shontell Hewlett

v.

Case No. 22-CV-1376

Jason Hill, and Zachary Lange

"MOTION FOR DEFENDANT'S TO PRODUCE DISCOVERY"

I, Damien Shontell Hewlett, hereby respectfully ask the court for an order that would force the Defendants, and their counsel, to Produce and answer the Interrogatory Question #10 for the Defendant Zachary Lange, and the Interrogatory Question #19 for the Defendant Jason Hill based upon the following reasons:

1. I the Plaintiff asked Defendant Zachary Lange the interrogatory question #10 - Have you ever been under investigation, or been accused of ignoring self harm before while being employed by the D.O.C in Wisconsin? This is relevant as for character witness evidence for Plaintiff in building his defense.
2. Defendant Zachary Lange had said in his response



to Interrogatory Question #10, "verbatim", "If the case is not dismissed on summary judgement, Defendant will revisit this request."

3. Defendant Zachary Lange had signed those Interrogatory Questions under oath pursuant to 28 U.S.C. § 1746 on date July 21, 2023.
4. I, the Plaintiff, had asked the Defendant Jason Hill the Interrogatory Question #19 - "Have you been under investigation for any acts of assault, excessive force, or ignoring suicidal inmate's while employed by the D.O.C in Wisconsin?"
5. Defendant Jason Hill, within his response to the Interrogatory Question #19, had said "verbatim", "If this case is not dismissed on Summary Judgement, Defendant will revisit this request."
6. Defendant Jason Hill had signed those interrogatory questions under oath pursuant to 28 U.S.C. § 1746 on date July 24, 2023.
7. This case was "NOT" dismissed by you when these Defendants moved for Summary judgement



Within Your Court Honorable Griesbach.

8. So i've "attempted" already to resolve these discovery demands, when I had initially requested these interrogatories from said Defendant's and their counsel.

I, Damien Shontell Hewlett, hereby declare,  
Pursuant 28 U.S.C. § 1746, under penalty  
of perjury that the aforementioned statements  
are true and correct.

Respectfully Submitted By, Damien S. Hewlett  
Date of: April 20, 2024